

THE HONORABLE MARSHA J. PECHMAN

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TRAVIS MICKELSON, DANIELLE H.  
MICKELSON, and the marital community  
thereof,

Plaintiffs,

v.

CHASE HOME FINANCE LLC, an unknown  
entity, et al.,

Defendants.

No. 2:11-cv-01445-9

DEFENDANT CHICAGO TITLE  
INSURANCE COMPANY'S JOINDER IN  
CHASE, MERS, AND FREDDIE MAC'S  
PARTIAL MOTION TO DISMISS FILED  
ON JANUARY 12, 2012

**NOTE ON MOTION CALENDAR:  
Friday, February 3, 2012**

By Order dated November 14, 2011, this Court granted Defendant Chicago Title Insurance Company's ("Chicago") Motion to Dismiss. (Dkt. No. 35). The Court's Order dismissed Plaintiffs' breach of good faith claim against Chicago. The Court's Order further stated that Chicago had not moved for dismissal of any other claims against it.

Chicago now joins Defendants Chase Home Finance LLC, Mortgage Electronic Registration Systems, Inc., and Federal Home Loan Mortgage Corporation in their Partial

1 Motion to Dismiss filed January 12, 2012. (Dkt. No. 43). For the reasons already stated by  
2 Defendants' in their Motion (Dkt. No. 43) Chicago respectfully requests this Court enter an  
3 Order dismissing Plaintiff's remaining claims against it which appear to include a claim under  
4 Washington's Consumer Protection Act and a claim for Criminal Profiteering. Plaintiffs'  
5 conclusory legal allegations pled in their Amended Complaint are insufficient to sustain these  
6 claims.

7 DATED this 13th day of January, 2012.

8 FIDELITY NATIONAL LAW GROUP

9 /s/ Erin M. Stines

10 Erin M. Stines, WSBA #31501

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**CERTIFICATE OF SERVICE**

I certify that on the date given below I electronically filed this document entitled CHICAGO TITLE INSURANCE COMPANY'S SECOND MOTION TO DISMISS with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following persons:

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DEFENDANT CHICAGO'S JOINDER IN DEFENDANTS' MOTION  
TO DISMISS FILED ON JANUARY 12, 2012 – 3  
NO. 2:11-CV-01445

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7  
8 **SIGNED** this 13<sup>th</sup> day of January, at Seattle, Washington.

9 /s/ Erin M. Stines  
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